

JUDGE SCHOFIELD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

-----X
UNITED STATES OF AMERICA

:
: Sealed Indictment

- v. -

:
: 16 Cr

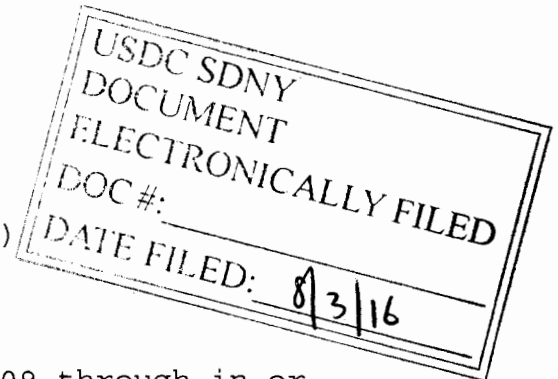
STEVEN WILLIAMS,

: **16 CRIM 526**

Defendant.
: X

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COUNT ONE

(Narcotics Conspiracy)



The Grand Jury charges:

1. From at least in or about 2009 through in or about August 2015, in the Southern District of New York and elsewhere, STEVEN WILLIAMS, the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that STEVEN WILLIAMS, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that STEVEN WILLIAMS, the defendant, conspired to distribute and possess with the intent to distribute were (i) one kilogram and more of mixtures

and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A); and (ii) five kilograms and more of mixtures and substances containing a detectable amount of cocaine, its salts, optical and geometric isomers, and salts of isomers, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Money Laundering)

The Grand Jury further charges:

4. From at least in or about 2009 through in or about August 2015, in the Southern District of New York and elsewhere, STEVEN WILLIAMS, the defendant, did knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, which in fact involved the proceeds of specified unlawful activity, to wit, the proceeds of illegal narcotics transactions and money laundering activity, with the intent to promote the carrying on of specified unlawful activity, to wit, the proceeds of illegal narcotics transactions and money laundering activity.

(Title 18, United States Code, Sections 1956(a)(1)(A)(i) and 2).

FORFEITURE ALLEGATION AS TO COUNT ONE

5. As a result of committing the controlled substance offense charged in Count One of this Indictment, STEVEN WILLIAMS, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as a result of the offense charged in Count One of the Indictment and any and all property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense charged in Count One of this Indictment.

FORFEITURE ALLEGATION AS TO COUNT TWO

6. As a result of committing the offense alleged in Count Two of this Indictment, STEVEN WILLIAMS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Assets Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of STEVEN WILLIAMS, the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

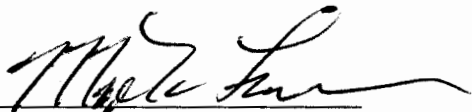
d. has been substantially diminished in value;
or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853(p); and
Title 28, United States Code, Section 2461(c).)


Foreperson
Aug 3 2016


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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Defendant.

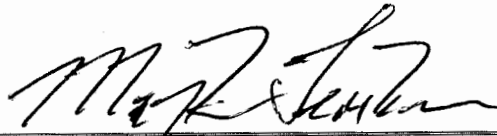
SEALED INDICTMENT

16 Cr.

(18 U.S.C. §§ 2, 1956;
21 U.S.C. § 846)

PREET BHARARA

United States Attorney.



Foreperson.
